

**IN THE UNITED STATES DISTRICT COURT FOR THE  
EASTERN DISTRICT OF PENNSYLVANIA**

LASHEENA SIPP-LIPSCOMB AND ANDRES  
GARDIN, SR., INDIVIDUALLY AND IN  
THEIR OWN RIGHT AND AS PARENTS  
AND NATURAL GUARDIANS OF A.G., JR.,  
A MINOR

vs.

EINSTEIN PHYSICIANS PENNYPACK  
PEDIATRICS, et al.

Civil Action No. 2:20-cv-01926-MMB

**ARJUN KALYANPUR, MD AND TELERADIOLOGY SOLUTIONS, P.C.'S**

**PROPOSED JURY VERDICT FORM**

Defendants Arjun Kalyanpur, MD and Teleradiology Solutions, P.C., by and through their attorneys, Kiernan Trebach LLP, propose the enclosed Jury Verdict Form. Defendants reserve the right to amend or supplement this Proposed Verdict Form based on evidence admitted, and rulings made by the Court, at the time of trial.

RESPECTFULLY SUBMITTED,  
KIERNAN TREBACH LLP



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GEORGE L. YOUNG, ESQUIRE  
Attorney ID No. 26221  
*Attorney for Defendants, Arjun Kalyanpur, MD and  
Teleradiology Solutions, P.C.*

Date: January 13, 2023

**QUESTION 1**

Do you find the Defendants were negligent in the care and treatment provided to Minor Plaintiff?

Pennypack Pediatrics	Yes	No
St. Christopher's Hospital for Children.	Yes	No
Hayley Bartkus	Yes	No
Erin E. Hassel, M.D.	Yes	No
Pramath Nath, M.D.	Yes	No
Urology for Children	Yes	No
Charles Concodora, M.D.	Yes	No
Eric Cho, M.D.	Yes	No
Arjun Kalyanpur, M.D.	Yes	No

*For all Defendants for whom your answer to Question 1 was "Yes", proceed to Question 2. If you answered "No" as to all Defendants in Question 1, please return to the courtroom.*

**QUESTION 2**

Was the negligence of Defendants a factual cause of harm to Minor Plaintiff?

Pennypack Pediatrics	Yes	No
St. Christopher's Hospital for Children.	Yes	No
Hayley Bartkus	Yes	No
Erin E. Hassel, M.D.	Yes	No
Pramath Nath, M.D.	Yes	No
Urology for Children	Yes	No
Charles Concodora, M.D.	Yes	No
Eric Cho, M.D.	Yes	No
Arjun Kalyanpur, M.D.	Yes	No

*If you answered Question 2 “Yes” for two or more Defendants, then proceed to Question 3. If you answered Question 2 “Yes” for only one Defendant, then proceed to Question 4. If you answered Question 2 “No” for all defendants, please return to the courtroom.*

### **QUESTION 3**

If your answers to Questions 1 and 2 are “Yes” with regard to more than one of the Defendants, state next to each of those Defendants for whom you answered “Yes” the percentage of causal negligence you attribute to that Defendant. The total must equal 100%.

Pennypack Pediatrics	_____ %
St. Christopher’s Hospital for Children	_____ %
Hayley Bartkus	_____ %
Erin E. Hassel, M.D.	_____ %
Pramath Nath, M.D.	_____ %
Urology for Children	_____ %
Charles Concodora, M.D.	_____ %
Eric Cho, M.D.	_____ %
Arjun Kalyanpur, M.D.	_____ %

*Proceed to Question 4.*

### **QUESTION 4**

State the total amount of damages, if any, sustained by Plaintiff(s):

\$ \_\_\_\_\_

\_\_\_\_\_  
Jury Foreperson

Date:

**CERTIFICATE OF SERVICE**

I, George L. Young, Esquire, hereby certify that a true and correct copy of Defendants, Arjun Kalyanpur, MD and Teleradiology Solutions, P.C.'s Proposed Jury Verdict Form was served upon all counsel of record via electronic filing on January 13, 2023.

A handwritten signature in black ink, appearing to be 'G. Young', written over a horizontal line.

By: \_\_\_\_\_  
GEORGE L. YOUNG, ESQUIRE

Date: January 13, 2023